

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

23-CR-99

v.

**RESPONSE AND
MOTION FOR JOINDER**

MICHAEL RONCONE,

Defendant

PLEASE TAKE NOTICE, that upon the annexed Affirmation of Paul G. Dell, Esq., dated the 13th day of June, 2024, and upon all the pleadings and proceedings heretofore had herein, Defendant Michael Roncone hereby moves this Court (United States Magistrate Judge Jeremiah J. McCarthy) for an Order granting Joinder in the co-defendants' motions for relief to the extent that they apply to him, along with other and further relief as the Court deems proper.

DATED: Buffalo, NY
June 13, 2024

/s/ Paul G. Dell, Esq.
PAUL G. DELL, ESQ.
Attorney for Defendant
Michael Roncone
70 Niagara Street
Buffalo, New York 14202
(716) 362-1156
pgdell@aol.com

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AFFIRMATION

MICHAEL RONCONE,

Defendant

STATE OF NEW YORK }
COUNTY OF ERIE } ss.:
CITY OF BUFFALO }

PAUL G. DELL, ESQ., under penalty of perjury, says that:

1. I am the attorney for the defendant, Michael Roncone.
2. I hereby move this Court to join in the motions of the co-defendants in this case to the extent that they apply to Mr. Roncone.
3. There have been references in Court and the filings that I emailed AUSA Nicholas Cooper and consented to the Government's initial proposed protective order. It had been several months since I had worked on the file, and I was eager to finally review discovery. My general approach is that I want to see the discovery as soon as

possible – once I know what it is, I can take steps to modify a protective order depending on the stage of the case.

4. I was later made aware of the issues that other defense counsel had with the proposed order. I share the concerns of the other defense attorneys and hereby join in their motions.

WHEREFORE, it is respectfully requested that the Court grant the requested relief.

s / Paul G. Dell, Esq.
PAUL G. DELL
June 13, 2024
Attorney for Defendant
Michael Roncone
70 Niagara Street
Buffalo, New York 14202
(716) 362-1156
pgdell@aol.com

CERTIFICATE OF SERVICE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

23-CR-99

MICHAEL RONCONE,

Defendant.

I hereby certify that on June 13, 2024, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the appropriate CM/CMF participants on this case.

s / Paul G. Dell, Esq.
PAUL G. DELL
June 13, 2024
Attorney for Defendant
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Buffalo, New York 14202
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pgdell@aol.com